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Attorneys for Defendants
Particle LLC and Denise Kozlowski

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

COACHELLA MUSIC
FESTIVAL, LLC and
GOLDENVOICE, LLC,

Plaintiffs,

v.

PARTICLE LLC; et al.,

Defendants.

Case No. 2:16-cv-02539-SJO (Ex)

**STIPULATED [PROPOSED] ORDER
FOR ENTRY OF PERMANENT
INJUNCTION AND FINAL
JUDGMENT AGAINST
DEFENDANTS PARTICLE LLC AND
KOZLOWSKI**

Hon. S. James Otero

Coachella Music Festival, LLC and Goldenvoice, LLC (collectively, “Plaintiffs”) and Particle LLC and Denise Kozlowski (collectively, “Defendants”), having reached a full settlement of this matter without admission of liability, hereby stipulate, subject to the approval of the Court, to the entry of the permanent injunction and final judgment against Defendants set forth below.

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

Plaintiffs and Defendants, having reached a full settlement of this matter, hereby stipulate and agree to the entry of a permanent injunction and final judgment as follows:

1. Defendants Particle LLC and Denise Kozlowski, their officers, agents, servants, employees, and those persons in active concert or participation with them who receive actual notice of this Order, are permanently enjoined from:

- a. Using any of the COACHELLA Marks attached as Exhibit 1 to this Order, or any confusingly similar designation thereto without Plaintiff’s prior written authorization;
- b. Selling, offering to sell, or trading any pass (including public or non-public pass) to the Coachella Valley Music & Arts Festival;
- c. Using any pass (including public or non-public pass) to the Coachella Valley Music & Arts Festival in connection with any commercial offering of goods or services without Plaintiffs’ written authorization; and
- d. Assisting or aiding and abetting any other person or business entity in engaging in any of the items recited in paragraphs 1(a)-(c) of this Order.

2. This Court has jurisdiction over the parties and the subject matter of this action. This Court shall retain jurisdiction to the extent necessary to enforce this Permanent Injunction.

3. All relief not expressly granted herein is DENIED.

4. Each party shall bear its own costs, expenses, and attorney’s fees.

5. This is a Final Judgment.

Dated: June 24, 2016

Tucker Ellis LLP

By: /s/David J. Steele

David J. Steele
Howard A. Kroll
Steven E. Lauridsen

Attorneys for Defendants
Particle LLC
Denise Kozlowski

DATED: June 24, 2016

FREEDMAN + TAITELMAN, LLP

By: /s/Patricia Arias Musitano*

Patricia Arias Musitano
Attorneys for Defendants
Particle LLC
Denise Kozlowski

*Pursuant to Local Rule 5-4.3.4(a)(2), the filing party attests that Defendants' counsel concurs in the content of this Consent Judgment and has authorized its filing with her electronic signature.

IT IS HEREBY ORDERED



Dated: June 28, 2016

Hon. S. James Otero
United States District Judge